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UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)	MAG. NO. 22-0988 KJM
)	
Plaintiff,)	CRIMINAL COMPLAINT;
)	AFFIDAVIT IN SUPPORT OF
)	CRIMINAL COMPLAINT
)	
vs.)	
)	
JONATHAN FARR,)	
)	
Defendant.)	
)	
)	
)	

SEALED
BY ORDER OF THE COURT

CRIMINAL COMPLAINT

I, the undersigned complainant, being duly sworn, state that the following is true and correct to the best of my knowledge and belief.

COUNT 1

Receipt of Child Pornography
(18 U.S.C. § 2252A(a)(2) and (b))

In or around June 2019 through May 2020, within the District of Hawaii and elsewhere, JONATHAN FARR, the defendant, knowingly received any child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that has been shipped or transported in or affecting interstate or foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Section 2252A(a)(2) and (b).

COUNT 2


Distribution of Child Pornography
(18 U.S.C. § 2252A(a)(2) and (b))

In or around April 2020, within the District of Hawaii and elsewhere, JONATHAN FARR, the defendant, knowingly distributed any child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that has been shipped or transported in or affecting interstate or foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Section 2252A(a)(2) and (b).


I further state that I am a Special Agent with the Federal Bureau of Investigation (FBI) and that this Complaint is based upon the facts set forth in the attached "Affidavit in Support of Criminal Complaint," which is incorporated herein by reference.

DATED: June 7, 2022, Honolulu, Hawaii.


JENNIFER CARDIFF
Special Agent
Federal Bureau of Investigation

Sworn to under oath before me telephonically, and attestation acknowledged pursuant to Federal Rule of Criminal Procedure 4.1(b)(2), on this 7th day of June 2022, at Honolulu, Hawaii.




Kenneth J. Mansfield
United States Magistrate Judge

United States v. Jonathan Farr
Mag. No. 22-0988 KJM
Criminal Complaint

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

INTRODUCTION

1. This affidavit is submitted for the purpose of establishing probable cause that JONATHAN FARR (“FARR”), the defendant, committed the following offense within the District of Hawaii and elsewhere in or around June 2019 through May 2020: 18 U.S.C. § 2252A(a)(2), which makes it a crime to knowingly receive or distribute child pornography that has been mailed, shipped, or transported interstate or foreign commerce by any means, including by computer. In particular, I point to Paragraph 29 below as perhaps the strongest evidence herein that FARR received and distributed child pornography.

2. I am a Special Agent with the Federal Bureau of Investigation, Honolulu Field Office. I have been a Special Agent since March 2019 and have worked a variety of investigations. Currently, I am assigned to the Violent Crime Task Force, working on investigations into crimes against children. As part of my current duties, I investigate criminal violations relating to child exploitation and child pornography, including violations pertaining to the illegal production, distribution, receipt, and possession of child pornography. Through my training and experience, I have had the opportunity to observe and review numerous examples of

child pornography in various forms of media including computer and cellphone media. I have utilized court-authorized search warrants, conducted physical surveillance, attended trainings, and interviewed subjects and witnesses regarding violent crimes against children cases.

3. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other law enforcement agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the offenses in the requested Complaint and does not set forth all of my knowledge or facts about this matter.

PROBABLE CAUSE

4. Law enforcement has been investigating multiple reports from two minor females and their adult guardians relating to online child exploitation activity who will be referred to in this affidavit as MV1 and MV2. After reviewing initial reports, law enforcement separately interviewed both victims.

Victim MV1

5. On or about July 28, 2020, your affiant interviewed MV1 (presently, a 19-year-old-female; DOB: September 2002) and her mother. MV1 stated that she met an individual in June 2019, when she was sixteen (16) years old, through an online chat of the game Dungeons and Dragons. MV1 knew this individual as “Jonathan Farr” (referred to hereinafter as FARR). FARR replied to MV1’s post on

a game, and they soon switched to chatting on Facebook Messenger, Snapchat, and Discord (online platforms where individual users can communicate and message each other directly). This communication led to MV1 and FARR “dating” online for about eight (8) months until approximately February 2020. Facebook messages and videos travel in interstate commerce when posted, sent, and exchanged.

6. According to MV1, FARR knew MV1 was under the age of 18 at the time of their “relationship.” According to MV1, FARR utilized Facebook Messenger, texting, and calling to try to convince MV1 to move to Hawaii. FARR talked to MV1 about her engaging in sexual activities with his friends when she arrived in Hawaii. FARR further told MV1 that FARR previously had hands-on sexual experiences with two (2) minors who lived in Hawaii. FARR told MV1 that the minors were approximately twelve (12) years old.

7. MV1 stated that FARR requested that MV1 send him nude photographs that included her face and entire body at least once per week or every other week. According to MV1, FARR told her it would be fun if they exchanged videos and pictures of themselves online. According to MV1, FARR and MV1 did exchange such videos and photographs. In some of the videos and photographs sent by MV1 to FARR, MV1 was nude, and the photographs are sexual in nature. FARR initiated this conduct by sending MV1 nude photos and videos of himself using Facebook Messenger. According to MV1’s mother, at one point in time, she walked in on MV1

communicating with FARR online and MV1 was nude from the waist up. MV1's mother noted that FARR, at one point sent, her and her daughter a picture of his Hawaii Identification Card to confirm his identity. Your affiant reviewed the provided picture of FARR's Hawaii Identification Card and confirmed the individual as FARR. The identification card included FARR's name, Date of Birth, and Hawaii state ID number; FARR's address was covered with a piece of paper.

8. Sometime in February 2020, FARR "broke up" with MV1. FARR was 26 years old at the time. MV1 was under the age of 18 at the time of the "breakup."

9. MV1 did not provide screenshots or supporting documents relating to her chats with FARR to law enforcement and explained that she had deleted everything. MV1 related that at some point FARR sent certain nude and sexual photographs and videos of MV1 to MV2.

Victim MV2

10. On July 28, 2020, FBI Agents contacted MV2 (presently, an 18-year-old female; DOB: September 2003). MV2 stated that MV1 introduced her to FARR. According to MV2, she was fifteen (15) years old when first introduced to FARR. According to MV2, when MV1 and FARR were "dating" online, MV2 was invited onto a Facebook Video Call with FARR and MV1. On that video call, FARR tried to get MV1 and MV2 to take off their clothes. According to MV2, FARR started masturbating on camera. MV2 left the call because she felt uncomfortable.

According to MV2, MV2 was fifteen (15) years old and MV1 was sixteen (16) years old at the time of that particular call.

11. According to MV2, she started talking to FARR online through Facebook Messenger after MV1 and FARR “broke up.” This developed into an online “relationship.” MV2 stated that she started dating FARR in approximately February of 2020, and they “broke up” in approximately May 2020. MV2 was under the age of eighteen (18) in May of 2020. According to MV2, FARR knew MV2 was only sixteen (16) years old when they began “dating.”

12. According to MV2, due to COVID-19, FARR and MV2 were at times both quarantined, so they were in contact almost constantly. MV2 stated FARR asked MV2 for nude photographs and sexual favors over the phone or online utilizing Facebook Messenger. FARR also asked MV2 to strip nude on camera and claimed he would “fly to America to have sex” with MV2.

13. According to MV2, FARR lived in Hawaii, which is approximately six (6) hours behind MV2’s time zone. FARR sent MV2 gifts such as a journal, pens, dice for games, food from Hawaii, clothes, cosmetic items, and corsets.

14. On approximately September 15, 2020, FBI agents met with MV2 and her step-grandmother. MV2 provided the FBI screenshots of Facebook Messages between MV2 and FARR. The photographs provided to agents show the user of FARR’s Facebook Account and MV2 engaged in sexually explicit conversation and

show that FARR received sexually explicit photographs of MV2, which had been sent to him by MV2. Some of the photographs MV2 sent to FARR over Facebook Messenger start with pictures of her face and show her remove her shirt and show her breasts. Other photographs show FARR requesting pictures of MV2, and she then sends a photograph in bra and underwear lingerie that shows her entire body and face in the photograph. MV2 also sent picture of herself in maroon lace underwear, showing her buttocks. One other photograph MV2 sent is blurry, but shows MV2 nude from the waist up in a shower mirror. FARR sent MV2 photographs that show his face and penis.

15. MV2 showed the agents screenshots of FARR's face. FBI Agents compared the provided screenshot of FARR from Facebook to a known photograph of FARR, and the photos appeared to depict the same person.. Based on FARR's known Hawaii Identification Card photograph that he allegedly sent to MV1 and her mother, FBI agents confirmed all photographs appeared to depict the same person.

16. The following is an example of a conversation between MV2 and FARR on Facebook during their online "relationship":

FARR: And I wanna slowly strip you myself as you helplessly buckle your legs from anticipation

And then ever so slowly look back into your eyes and lean in for a slow methodical dragged out kiss

MV2: Jon I'm getting really wet

FARR: Then slowly start making out as I come closer to you And start getting more and more intense and aggressive But slowly at first
Are you uncomfortable with this

MV2: No, in just a little sleepy and horny so in about to pass out but also want to play with myself

FARR: So play

I get more and more aggressive

Making out with you in a heat of passion and lust and animalistic raw heat

I start to force you on your back and mount you

Ready to pounce and devour you and RIP your flesh apart with my teeth and consume you till there's nothing but complete satisfaction and orgasmic pleasure!

And then return to being sweet and caring tending to any damage that may have accrued as well as cuddling and movie/nap after

MV2: So uhm what exactly do you want?

FARR: I want to tie you up and blindfold you and play with your princess parts untile you explode all over me multiple times and record and show you off to select people

Rn now though it would just be for me.

I'd tease with toys and bite you everywhere
and leave all kinds of Mark's all over you

I'd make you beg for me to cum inside you
and give you all of me.

I want you to cum so much and so strongly
you walk funny and I want you to get naked
and maybe find for me and strip a shirt or
something if you're comfortable enough

My sweet doll face

MV2: I'm getting horny –

FARR: Good that's my good girl!

I want to see you up right likenlastnight when
you were bouncing

But I want you to grind

MV2: Yes sir

FARR: Good girl!

MV2: I TOOK A GOOD PICTURE BUT MY BAG
OF CHIPS IS IN IT.

FARR: Show your daddy

MV2: [Agent note: MV2 sent picture of herself in
maroon lace underwear of buttocks with chip
bag in background]

I don't like it nvm

I don't photography well

FARR: I love it

I want a sex pic with this indies sitting up in front of the camera teasing daddy!

MV2: Oh –

FARR: Show daddy your dirty side my little one!

]

MV2: Can we wait until later and we're on call? Bc if I try to do video I just delete them

FARR: Well do a pic at least!

MV2: I tried and it looked bad!! The lighting is off!!

FARR: Let daddy be the judge of that baby doll

MV2: I took one, but Idk if I can't take anymore I can't look at myself right now –

FARR: Show me love

MV2: [Agent note: MV2 sent picture of herself in lace bra and underwear with face showing]

I'm sorry I was sitting weird

I

I can't I'm sorry

I can't look at myself right now

FARR: Gotta spread your legs a little more and pull your shoulders back a little

You're beautiful baby.

MV2: I can't try again right now. I'm taking off this stupid bra and putting a shirt on. I can't. It hurts too much. I'm sorry.

FARR: That's okay baby

You did good!

17. On September 30, 2020, FBI Agents contacted MV2, to determine if she had any conversations with FARR where they discussed MV2's age. On October 4, 2020, MV2 provided the FBI additional screenshots of Facebook messages with FARR that were exchanged on approximately March 21, 2020 and May 24, 2020, respectively. The messages contained information confirming FARR knew MV2 was a minor at the time of their "relationship" and when FARR received the sexually explicit images of MV2. Below is the exchange between MV2 and FARR:

Message exchanged March 21, 2020:

FARR: I'm having conflicting thoughts again

MV2: Oh
I'm sorry baby

FARR: Your only 2 years older then 15¹
Is that really enough of a difference?

¹ At the time of these conversations, MV2 was 16 years old. It is unclear why FARR seemed to refer to her as being 17 years old in this message; however, in messages set forth below, FARR confirmed she was 16 years old.

MV2: To me it is.

FARR: Okay...

Messages exchanged May 24, 2020:

FARR : Fourthly you are fucking 16!
You haven't even started your life.
You're at the beginning of building it.
You have a long way to go to be able to do something.

18. Prior to the FBI's investigation into FARR, past girlfriends, victims, and associates of FARR created a Facebook page highlighting their prior negative relationships with FARR.

Prior Facebook Search Warrants

19. Open source information revealed FARR is associated with email address "XXXXXXathan@ymail.com"[sic]. Results of a subpoena to Facebook for accounts associated with the email address, "XXXXXXathan@ymail.com", contained information indicating the Facebook account had a vanity name of "XXXXXXathan" and an associated phone number of XXX-XXX-5807.

Farr's Facebook Account

20. On January 15, 2021 FBI Agents served a search warrant on Facebook for FARR's account. Review of the Facebook account showed FARR blocked MV1

and MV2's Facebook accounts. Multiple conversations with MV1 and MV2, including group chats, from June 2019 through April 2020 were found. Below is an excerpt of a conversation between MV1, MV2, and FARR where the group asked everyone in the chat's age:

FARR: 26

MV1: 16 for like 3 more months

MV2: I'm 15 for 3 more months

21. FARR also linked media to his Facebook Account of non-sexual pictures and videos of MV1 and MV2. FARR had further conversations with other users and stated he was scared for his life and, "blocked everyone and deleted messages way before any of this happened." Below is a conversation between FARR and a WITNESS from Facebook on August 6, 2020:

FARR: So last year I dated this girl. She was under 18 but she was at the age of consent. Things ended badly between us and we live In different states
I also dated her friend after and she was about the same age
I was 26 and am now 27

WITNESS: YOU DATED A MINOR?

FARR: She was 17 turning 18 in a month
It wasn't so black and white
It was something I do regret
And wish I hadn't

During the same conversation, the WITNESS asked FARR how many underage girls he had dated and FARR replied with, "2." I believe FARR was referring dating MV1 and MV2.

22. The Facebook search warrant returns of FARR's Facebook Account further showed his phone number associated with his Facebook Account was the same number as provided by MV1 and MV2: XXX-XXX-5807, which was verified on July 4, 2018 by Facebook. The mobile device connected to the Facebook Account was utilizing Operating System Android 10, which was updated on February 3, 2021. FARR's Facebook had a secondary telephone number associated of XXX-XXX-6160, which was not verified on Facebook.

23. The Facebook returns of FARR's Facebook Account also provided multiple Internet Protocol ("IP") addresses, which came back to Verizon Wireless.

24. FBI, in January and March 2022, sent subpoenas to Verizon for the phone number XXX-XXX-5807, which both came back to Jonathan FARR as the subscriber.

25. Due to the previously referenced Facebook page that addressed the allegations against FARR, FBI Agents believe FARR may have removed content from his Facebook Account related to interactions with the minors prior to the FBI's preservation request, subpoenas, and a search warrant.

MV2's Facebook Account

26. MV2 stated to law enforcement she no longer had access to the Facebook account she utilized to communicate with FARR. Accordingly, the FBI, with the consent of MV2, executed a search warrant on MV2's Facebook Account specific to conversations with MV1, MV2, and FARR.

27. On June 17, 2021, FBI Agents served search warrants on two (2) Facebook Accounts provided by and associated with MV2. The search warrants were limited to only interactions between MV2's Facebook account and FARR's Facebook account.

28. The returns from one of the Facebook accounts include various conversations in Facebook Messenger with FARR's Facebook account where MV2 and FARR messaged each other sexually. FARR and MV2 discussed FARR purchasing round trip tickets to visit MV2 as well as sending her gifts. FARR and MV2 sent sexually explicit images to each other; MV2's genitals were not visible in any of the pictures or videos sent. Some of the sexual messages sent match the screenshots of messages previously provided to agents by MV2. FARR further sent pictures and videos of himself with his genitals completely exposed to MV2. At one point FARR asked MV2 if she wanted to "see it," and then sent a video of himself masturbating and ejaculating. In the conversation, FARR confirmed he previously had photographs of MV1 on his phone and still kept photos of MV2 on his phone:

FARR: Also fun fact. I deleted all her photos that I had left. So that's done. Now I just have the ones of you on my phone

FARR when confronted by MV2 about messages calling FARR a pedophile stated:

FARR: Okay? So I'm a pedo and Kelbin being 22 and also dating a minor isn't?
The only other thing I might've said besides what she's told you is that there have been times where I feel a little too attracted to girls under 18. Usually High School age more than I should.
And now I'm falling for you and you're younger than her.

29. According to the search warrant returns from MV2's Facebook account and MV2's statements, using Facebook Messenger, MV2 sent multiple videos to FARR that depicted herself masturbating. Those videos show MV2's breasts and face, but her hands cover her genitals. Later, in and around April 2020, using Facebook Messenger, FARR began sending MV2 sexually explicit videos and images of MV1, including photographs and videos. Your affiant included the below descriptions:

- Unified_Message_2991191900994690.mp4- [Video of MV1 masturbating shows MV1's breasts and hand covering her genitals]
- Unified_Message_2728254264071770.jpg- [Photograph of MV1 that shows MV1's breast in the photograph]
- Unified_Message_542770663339600.mp4 – [Video of MV1 masturbating and penetrating genitals with object]

- Unified_Message_595249734675797.mp4- [MV1 masturbating showing MV1's face and genitals]

30. FARR further continually asked MV2 to send nude photographs and videos of herself, which MV2 deflected and declined multiple times.

Interview of Jonathan FARR

31. On May 19, 2022, FBI agents executed a search warrant on the person of Jonathan FARR and his cellphone, an LG V60 ThinQ UW Blue T-Mobile Device, with phone number XXX-XXX-5807.

32. While executing the search warrant, FBI Agents asked FARR if he would be willing to talk to them and told FARR he was free to leave at any point and not under arrest. FARR agreed to talk to FBI agents. FBI agents recorded this interview with FARR.

33. The pertinent information from the interview of FARR from May 19, 2022, included FARR admitting to being in an online "relationship" with both MV1 and MV2 while they were minors. FARR admitted to knowing both MV1 and MV2 were minors at the time they were "dating." FARR stated that he met both MV1 and MV2 while playing Dungeons and Dragons online and switched to talking to them via Facebook Messenger. FARR stated he sent both MV1 and MV2 gifts. FARR admitted to receiving sexually explicit images of MV1, which included her vagina and fully nude photographs. FARR admitted to receiving sexually explicit images of MV2, but that did not include her vagina and not as often as he received images

from MV1. FARR further claimed he “probably” sent sexually explicit photographs of MV1 to MV2 but could not recall. FARR further admitted to sending photographs of his penis to MV1 and MV2.

34. FBI agents showed FARR a screenshot of his Facebook Page, with the Facebook handle of “XXXXXXathan” and FARR confirmed that was his Facebook page. FARR confirmed his phone number was XXX-XXX-5807. FARR also confirmed his email address associated with his Facebook page was XXXXXXathan@ymail.com.

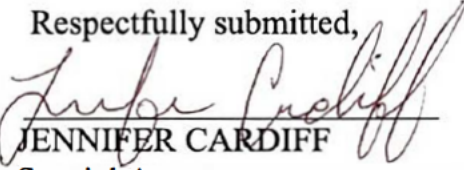
35. FARR further admitted to having in-person sexual contact with three (3) additional minor females in the state of Hawaii when he was over the age of 18. FARR admitted to knowing all of the females were under the age of 18 at the time of the in-person sexual contact and believed the minors were between twelve (12) and fourteen (14) at the time of the contact. FARR believed he was around twenty-two (22) when the offenses occurred.

36. In light of all of the above, I submit there is probable cause to conclude Jonathan FARR committed the offenses of Receipt and Distribution of Child Pornography, in violation of 18 U.S.C. §§2252A(a)(2).

CONCLUSION


WHEREFORE, based on the aforementioned facts, I respectfully submit that there is probable cause to conclude that Jonathan FARR committed the offense of 18 U.S.C. § 2252A(a)(2). I respectfully request that the Court issue the proposed arrest warrant.

Respectfully submitted,


JENNIFER CARDIFF
Special Agent
Federal Bureau of Investigation

Sworn to under oath before me telephonically, and attestation acknowledged pursuant to Federal Rule of Criminal Procedure 4.1(b)(2), on this 7th day of June, 2022, at Honolulu, Hawaii.




Kenneth J. Mansfield
United States Magistrate Judge

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